

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	SHAREEMA PETERKIN	:	CHAPTER 13
		:	
		:	
	DEBTOR	:	BANKRUPTCY No. 18-11505AMC

## **APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Zachary Perlick, Esquire, attorney for the Debtor in the above-captioned case applies under 330 of the Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. That, Zachary Perlick, Esquire, is attorney for the Debtor in the above-captioned case.
2. The debtor filed a petition under chapter 13 of the Bankruptcy Code on March 5, 2018.
3. The debtor's annualized current monthly income as set forth on Form B22C is:  
\_\_\_\_ above median (the amount on line 15 is not less than the line on line 16)  
  X   below median (the amount on line 15 is less than the line on line 16)
4. That, all services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.
5. That, Zachary Perlick, Esquire requests an award of compensation of Three Thousand Five Hundred and Twenty (\$3,520.00) Dollars for 14.2 Attorney hours and 2.1 Clerk hours expended on the initial compensation with client and in providing before confirmation.
  - (a) the customary services of counseling and representing chapter 13 debtor including: analysis of the financial situation; preparation, review and filing with the court of all required documents; correspondence, telephone conversations and miscellaneous contact with creditors, the trustee, attorneys and other parties in interest; preparation for and attendance at 341(a) meeting; and
  - (b) in representing the debtor in connection with :

X cure of a residential mortgage default or other treatment of residential real property claims

\_\_\_ ownership and claims relating to other real property

X motor vehicle loans or leases

\_\_\_ state federal tax claims

\_\_\_ domestic support obligations

\_\_\_ student loans

\_\_\_ 20 or more creditors listed in Schedule F

X automatic stay litigation

SERVICES RENDERED:

- (1) Analysis of the financial situation, and negotiation with opposing counsel and rendering advice and assistance to the Debtor in determining whether to file a petition under Title 11 of the USC. Counsel debtor on alternative chapters available under bankruptcy law and effects and consequences of filing a petition.
- (2) Order credit reports.
- (3) Meet with client re: property value review credit reports. Review additional bills, income and expenses. Review BRT and real estate taxes owed.
- (4) Interview with client. Preparation and filing of the Petition and Statement of Social Security Number and Certificate of credit counseling.
- (5) Notify utilities. Call to confirm.
- (6) Notify secured creditors. Call to confirm.
- (7) Preparation and filing of the Matrix.
- (8) Interview with client. Prepare, file and serve Chapter 13 Plan, Statement of Affairs, Schedules and other documents required by the Court.
- (9) Preparation of Debtor's Chapter 13 Current Monthly and Disposable Income and Chapter 13 Plan.
- (10) Letter to client re: Trustee and mortgage

- payments and amount, obligations leading to plan confirmation and beyond.
- (11) Handle creditor call regarding the status of the case and notice to certain creditors. Review and respond to collection attempts by creditors, collection agencies, attorneys and others. Calendar 341/confirmation dates and Proof of Claims deadlines.
  - (12) Review Proof of Claim filed by Credit Acceptance Corporation. Check plan.
  - (13) Review Proof of Claim filed by the Santander. Check Plan.
  - (14) Letter to client to attend Creditor's Meeting.  
Review trustee's report. Find comparable sales, check real estate taxes owed and get tax assessment.
  - (15) Review Proof of Claims filed by Portfolio Recovery, P.G.W., AmeriCredit Financial, Adtalem Global, U.S. Department of Education, Devry University, PECO, Premier Bankcard and LVNV.
  - (16) Scan and upload proof of SSI, mortgage statement, car loan statement, homeowner's and tax returns to 13 Documents.
  - (17) Preparation and representation of debtor at Creditor's Meeting.
  - (18) Review secured claims filed by PHFA and the City of Philadelphia.  
Check mortgage foreclosure docket and Sheriff Sale fees.
  - (19) Review Motion for Relief. Contact client.
  - (20) Prepare, file and serve Debtor's Amended Schedule I, Praecipe to Amend and Certificate of Service.
  - (21) Prepare, file and serve Answer to Motion for Relief. Contact client.
  - (22) Review Trustee's Motion to Dismiss. Check case report. Contact client.
  - (23) Confirmation hearing. Trustee's Motion to Dismiss hearing.
  - (24) Motion for Relief hearing. Negotiate with opposing counsel.

**Total amount of hours 14.2 Attorney hours and 2.1 Clerk hours**

POST-CONFIRMATION SERVICES:

- (a) Correspondence, telephone conversations and miscellaneous contact with creditors, Trustee, opposing counsel, and Debtor.
  - (b) Preparation and filing of miscellaneous pleading, motions, and applications, together with accompanying notices, if necessary.
  - (c) Preparation and filing of applications to discontinue wage order and notification of employer (if applicable).
  - (d) Monitor case.
  - (e) Preparation of praecipe for discharge and certification of discharge.
  - (f) Review and distribution to creditors.
6. Debtor's contract calls for counsel fees to be charged at \$300.00 per hour, and clerk fees at \$100.00 per hour.
7. Applicant requests reimbursement of expenses in the amount of \$20.00 for the following expenses:
- |   |                |
|---|----------------|
| Amended Schedule F  | <u>\$ 0.00</u> |
| Send notice to creditors, correspondence to client @ .49 each | <u>\$12.20</u> |
| Pacer Charges   | <u>\$ 3.00</u> |
| Copies, faxes   | <u>\$ 4.80</u> |
8. The debtor paid Zachary Perlick, Esquire \$1,500.00 prior to the filing of the petition.
9. A copy of the Applicant's disclosure of compensation pursuant to Fed. R. Bankr. P. 2016(b) is attached hereto as Exhibit "A".
10. None of the compensation paid to the undersigned will be shared with any other person, other than a member or regular associate of my law firm

WHEREFORE, Zachary Perlick, Esquire requests an award of \$ 3,500.00 in compensation and of \$20.00 in reimbursement of actual, necessary expenses.

Dated: 9/11/18

BY: /s/Zachary Perlick/  
Zachary Perlick, Esquire  
1420 Walnut Street, Suite 718  
Philadelphia, PA 19102  
(215) 569-2922  
(215) 569-1444